

EXHIBIT A

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARK SOKOLOW,

PLAINTIFF,

-against-

Case No:
04-397(GBD)(RLE)

PALESTINE LIBERATION ORGANIZATION,

DEFENDANT.

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DATE: January 10, 2012

TIME: 10:00 A.M

VIDEOTAPED DEPOSITION of the
non-party witness, MOSAAB HASSAN YOUSEF,
taken by the Plaintiff and Defendant,
pursuant to an Order and to the Federal
Rules of Civil Procedure, held at The
Berkman Law Offices, 111 Livingston Street,
Brooklyn, New York 11201, before RICHARD
W. BARRY, a Notary Public of the State of
New York.

1 - Y O U S E F -

2 Are you comfortable with that?

3 A. Well, I will do my best to be
4 comfortable.

5 Q. Okay.

6 Thank you.

7 Where were you born?

8 A. Ramallah.

9 Q. Where is that?

10 A. It is in the West Bank.

11 Q. And I will ask the Court
12 Reporter to-- there will be a lot of Arabic
13 words, names, so, it is important to us
14 that they come out in some coherent way.

15 So either, ask the witness for
16 the spelling or just keep track of it and
17 we will give you all the spellings at the
18 end. But, we want to be careful about
19 that.

20 Where did you grow up?

21 A. Ramallah area.

22 Q. Are you familiar with a--
23 sorry, when were you born?

24 A. 19-- May 6th, 1978.

25 Q. And, are you familiar with an

1 - Y O U S E F -

2 organization called Hamas?

3 A. Yes.

4 Q. What is the organization called
5 Hamas?

6 A. It is the Islamic resistance
7 movement and my father was one of the
8 founders of Hamas.

9 Q. What is your father's name?

10 A. Siekh Hassan Yousef.

11 Q. When you say that your father
12 was one of the founders of Hamas, can you
13 explain what you mean by that?

14 A. He was one of the founding
15 members of the movement and he still is one
16 of the leaders of the movement.

17 Q. When did your father found
18 Hamas?

19 A. Back in 1986.

20 Q. Did you yourself have any
21 personal involvement with Hamas?

22 A. Well, I was very close to Hamas
23 and its leadership. There is no standard
24 of who is a member. There is no membership
25 cards or numbers for members.

1 - Y O U S E F -

2 Q. Did you have a general plan of
3 what you were intending to do with the
4 guns?

5 A. The general plan was to take
6 revenge from Israel and Israelis.

7 Q. Did you have a general plan of
8 who you were intending to shoot with those
9 guns?

10 A. There was no plan at that point
11 but revenge was the motivation for sure.

12 Q. What were you hoping to get
13 revenge for?

14 A. Well, I had personal reasons.
15 I had ideological reasons and political
16 reasons that motivated me and inspired that
17 revenge.

18 Q. You mentioned that when you
19 were in Israeli prison, you learned
20 something about Hamas, did I get your
21 testimony correct?

22 A. Well, before that part, I was
23 asked by the Israeli intelligence if I
24 worked for them, and I agreed to work for
25 the Israeli intelligence. Then I was sent

1 - Y O U S E F -

2 to prison as a cover, so I don't get
3 exposed.

4 And during that time, I
5 discovered the brutality of Hamas torturing
6 their own members. In fact not only the
7 brutality of Hamas, also the brutality of
8 Fatah torturing their own members and that
9 opened the big question who was my enemy.
10 Why would I take revenge from Israel and
11 why I don't take revenge from Hamas
12 torturing and killing our people.

13 And that from that point on, I
14 started a journey of questioning all the
15 facts about my father's organization and
16 about my identity.

17 Q. Were you ever in your life
18 involved in planning any form of attack of
19 the Hamas organization?

20 A. I had a desire and I had the
21 motivation of revenge, as I said in my mind
22 all the time. But, I wasn't-- I never been
23 part of Hamas military plan or any
24 terrorist organization plan. Out of my
25 work with the Israeli intelligence.

1 - Y O U S E F -

2 yes, he was there. Was he in Yasser
3 Arafat's meeting, yes, he was there. Did I
4 read the reports of the meetings, of every
5 meeting, yes. Did I give it to the Israeli
6 government, yes, I did.

7 Was I in these meetings, yes, I
8 was in those meetings and I was witnessing
9 for the cooperation between Hamas and Fatah
10 and other Palestinian factions.

11 Q. Thank you.

12 And, you say that you were
13 present at meetings. Tell me what meetings
14 you are referring to. What meetings were
15 you present at relating to the second
16 Intifada and the involvement of the PA and
17 Hamas.

18 A. I was working as my father's
19 assistant during the second Palestinian
20 Intifada.

21 And, I was part of few
22 meetings, three or four meetings, with
23 Yasser Arafat, Marwan Barghouti and other
24 Palestinian faction representatives.

25 The meetings that I was not

1 - Y O U S E F -

2 in-- present in the meeting, I had access
3 to the report that my father wrote with his
4 hand and I printed and E-mailed it to all
5 Hammas locations and offices in Damascus and
6 Gaza and other West Bank cities, which gave
7 me access to information of what happened
8 in every single meeting between my father
9 and PLO and PA representatives.

10 Q. I'm sure this is obvious, but
11 just for the record, at the time that you
12 are referring to, who was Arafat?

13 A. Yasser Arafat was the PA and
14 PLO Chairman.

15 Q. In the meetings that you were
16 personally present at, what do you recall
17 Mr. Arafat saying with respect to the
18 second Intifada?

19 A. Excuse me?

20 Q. Talking about the meetings
21 where you were personally present. Do you
22 remember Arafat saying anything about the
23 second Intifada?

24 A. Well, in private meetings, I
25 did not see Yasser Arafat, attempt or

1 - Y O U S E F -

2 foundation.

3 A. If I remember right he was born
4 in Kuwait and lived in different Arab
5 countries and moved back to the Palestinian
6 territories, couple of years before the
7 Palestinian, second Intifada started.

8 Q. Have you met Abdula Barghouti.

9 A. Well, I never met him in
10 person, like in a meeting. But I was at
11 the location where he was arrested.

12 Q. Where was that?

13 A. It happened that that was just,
14 the building next to our residence in
15 Ramallah. We heard the-- some fire,
16 gunfire, and in a couple of minutes we
17 received a phone call and it was Marwan
18 Barghouti, telling my father to meet with
19 him outside because Jaber Perju, the PA
20 were trying to arrest two Hamas people.

21 Now, we didn't know who are the
22 two Hamas people and it happened that it
23 was Abdula Barghouti and Bila Barghouti and
24 that was their second arrest.

25 Now, Marwan Barghouti was

1 - Y O U S E F -

2 trying to force Jaber Perju not to arrest
3 them, and this why he called my father.

4 So now, there was a huge
5 argument between Jaber Perju, Marwan
6 Barghouti and my father just steps away
7 from where Bila and Abdula were hiding.

8 Now, the Palestinian Authority
9 was afraid that if they get into the place,
10 they get shot. And they were afraid at the
11 same time to kill Hamas bomb maker.

12 So, I was in that area, in that
13 sensitive situation, hearing all the
14 argument, listening to Abdula saying things
15 and threatening to kill anybody who gets
16 into the apartment.

17 Finally, Marwan Barghouti had
18 kind of deal with Jaber Perju on the side,
19 I didn't know what they said and he talked
20 to Abdula and had actually my father to
21 talk to him, convince him to go with the
22 forces, and they would release him
23 afterwards. That was the closest time that
24 I got to Abdula.

25 After he was released, I did